

1 DAVID J. MORTENSEN, ESQ.
2 Nevada Bar No. 2547
3 COURTNEY CHRISTOPHER, ESQ.
4 Nevada Bar No. 12717
5 DEREK LINFORD, ESQ.
6 Nevada Bar No. 14909
7 MESSNER REEVES LLP
8 8945 West Russell Road, Suite 300
9 Las Vegas, Nevada 89148
10 Telephone: (702) 363-5100
11 Facsimile: (702) 363-5101
12 E-mail: dmortensen@messner.com
cchristopher@messner.com
dlinford@messner.com

13 Attorneys for Defendant
14 *The Heights of Summerlin, LLC*
15 *And Summit Care, LLC*

16 **IN THE UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 SYLVIA SMITH, individually and as heir to
19 GEORGE L. WOODS, JR., her deceased
20 Father, and JOHN DOES ADMINISTRATOR,
21 as Special Administrator of THE ESTATE OF
22 GEORGE L. WOODS, JR.

23 Plaintiffs,
24 vs.

25 THE HEIGHTS OF SUMMERLIN, LLC;
26 SUMMIT CARE, LLC; GENESIS
27 HEALTHCARE, INC.; DOES 1-10, inclusive,
and, ROE CORPORATIONS, 1-10, inclusive,

28 Defendants.

Case No. 2:21-cv-01685

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS TO
FILE OPPOSITION TO PLAINTIFFS'
MOTION TO REMAND**
(SECOND REQUEST)

29 IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
30 counsel of record, that the deadline for Defendants The Heights of Summerlin, LLC and Summit Care,
31 LLC to file their Opposition to Plaintiffs' Motion to Remand (ECF No. 9, filed on October 1, 2021),
32 currently due October 15, 2021, be extended through October 20, 2021. This is Defendants' second
33

1 request for an extension and this Stipulation is submitted in good faith without the purpose of undue
2 delay.

3 Defendants filed their first request for an extension by way of Stipulation on October 15, 2021
4 (ECF No. 18, filed on October 15, 2021). The Court issued a Minute Order on October 18, 2021, denying
5 the Stipulation without prejudice, instructing the parties to submit a Stipulation that complies with LR
6 IA 6-1 and explains the reason that the extension is needed.

7 Courtney Christopher, Esq., counsel for Defendants, is the responsible attorney for the day-to-
8 day management and handling of this case. Ms. Christopher has experienced a family emergency related
9 to the health of her spouse that necessitated the need for the requested extension. This request is
10 submitted in good faith without the purpose of undue delay.

11
12 DATED this 18th day of October, 2021.

13 MESSNER REEVES LLP

14 /s/ Courtney Christopher

15 David J. Mortensen, Esq. (NBN 2547)
16 Courtney Christopher, Esq. (NBN 12717)
17 8945 West Russell Road, Suite 300
18 Las Vegas, Nevada 89148
19 *Attorneys for Defendants*
The Heights of Summerlin, LLC,
and Summit Care, LLC

DATED this 18th day of October, 2021.

F. TRAVIS BUCHANAN, ESQ. & ASSOC., PLLC

/s/ Travis Buchanan

F. Travis Buchanan, Esq. (NBN 009371)
701 E. Bridger Ave., Suite 540
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

20 IT IS SO ORDERED.

21
22 
UNITED STATES DISTRICT COURT JUDGE

23 DATED: 10-20-21, nunc pro tunc to 10-15-21